

HARRIS  
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ST. LAURENT  
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WECHSLER

So ordered.

/s/ Hon. Alvin K. Hellerstein  
May 13, 2021

May 12, 2021

**VIA ECF**

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Your Honor:

I am one of the lawyers representing defendant Marc Lawrence in this case. I write to respectfully request that the Court approve Mr. Lawrence's travel to Eugene, Oregon on May 25<sup>th</sup> so he can visit his girlfriend's daughter prior to his sentencing, as she is dealing with serious personal issues.

As part of the conditions of release that the Court set for Mr. Lawrence on June 26, 2019, his travel was restricted to the State of Florida and the Southern and Eastern Districts of New York. (Docket No. 8). Mr. Lawrence seeks to travel to Eugene, Oregon by plane, departing from Tampa, Florida on Tuesday, May 25<sup>th</sup>. On June 8<sup>th</sup>, Mr. Lawrence will fly from Eugene, Oregon directly to New York for his sentencing, with the intention, should his conditions of release be continued, of returning to Tampa, Florida on Thursday, June 10<sup>th</sup>.

Neither the government (AUSA Sagar Ravi) nor Pretrial Services (USPSO Anthony Zarate) objects to this request.

Sincerely,

/s/  
Michelle Fox

cc: AUSA Jilan Kamal, Esq. (by ECF)  
AUSA Sagar Ravi, Esq. (by ECF)